



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

May 4, 2023

VIA ECF

The Honorable P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Brijesh Goel*
22 Cr. 396 (PKC)

Dear Judge Castel:

The Government writes to update the Court regarding the Government's progress in satisfying the Court's directives during the April 27, 2023 conference and to request two extensions on consent.

As directed by the Court, the Government contacted counsel to Barclays and conveyed a request that Barclays produce a copy of Akshay Niranjan's letter of resignation. Counsel to Barclays subsequently advised the Government that, though Barclays has been searching for such a resignation letter, Barclays does not believe it has any Niranjan resignation letters and that it believes Niranjan's resignation in 2022 was tendered orally. Should Barclays later find such a letter, the Government will produce it to the defense.

As directed by the Court, the Government also contacted counsel to Akshay Niranjan and conveyed the specific requests discussed during the April 27 conference. (The Government has provided the defense with the text of the requests.) In response, counsel to Niranjan informed the Government, in substance, of the following:

- The computer that Niranjan used during 2017 to 2018 no longer works due to water damage, and thus the algorithm and internet search history from that time period are not available. Counsel to Niranjan indicated that there are certain records reflecting more recent internet search history, which are being gathered for production.
- All communications between Niranjan and his brother relating to the insider trading scheme have already been produced, and they have no additional responsive communications to produce based on the Government's request for searches of particular tickers and company names.

- There are certain communications with Niranjan's brother related to the brother's trading account, which are being gathered for production.

As directed by the Court, the Government has also: (a) advised the defense of additional context, where available, regarding previously disclosed excerpts of notes and FBI 302s from interviews of Niranjan and discussions with his counsel; (b) confirmed that its audio analyst intends to use the same software that it used to conduct the initial enhancement (which has already been disclosed to defense counsel) for any additional enhancements; and (c) made certain designations, identified by Bates number and by time stamp, from the recordings that it intends to ask the FBI to attempt to further enhance.

The Government has also endeavored to complete reformatted and revised transcripts of the June 5, 2022 and June 10, 2022 recordings, including refined translations of the Hindi language portions. Because it appears the vendor assisting the Government with those translations will not complete its work until Friday at the earliest, the Government respectfully requests that the deadline to provide updated and reformatted transcripts to the defense be extended to Monday, May 8, 2023. The defendant, by email from counsel, confirmed that he consents to the requested extension.

Separately, but relatedly, the defendant requests that it be permitted until Monday, May 8, 2023, to designate any portions of the recordings it wishes to ask the FBI to enhance. The Government consents to that request.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: _____ /s/

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cc: Defense Counsel (by ECF)